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11 IN THE UNITED STATES DISTRICT COURT
12 FOR THE DISTRICT OF ARIZONA
13

14 United States of America,
15 Plaintiff,

16 vs.

17 Daniel David Rigmaiden,
18 Defendant.
19

CR-08-814-001-PHX-DGC

**MOTION FOR ENLARGEMENT
OF TIME**

20 The United States, by and through its attorneys undersigned, respectfully requests
21 this Court enter an order enlarging the time for the government to complete its expert
22 disclosures, including compliance with Rule 16(a)(1)(G); and Government Rule 404(b)
23 notification, until Friday, March 28, 2014. The parties in the District of Arizona have
24 agreed to a global plea agreement in this case. In so doing, the parties have agreed to
25 resolve all outstanding issues regarding the charges in the case, restitution, the return of
26 property, the forfeiture and abandonment of property, and the deletion data from seized
27 digital media that may have been outside of the scope of the search warrants obtained in
28 this case. As of this date, the agreed upon data deletion is complete. The sole remaining

1 issue with respect to this case and the global plea agreement is approval from the
2 Criminal Division of the Department of Justice. The Criminal Division has advised the
3 U.S. Attorney's Office in this District that it needs additional time to consider the
4 approval request. As a result, the United States is seeking this extension so that it may
5 continue its undivided efforts to obtain the final pending approval in this case. Defendant
6 DANIEL DAVID RIGMAIDEN has no objection to this motion.

7 It is expected that excludable delay under 18 U.S.C. § 3161(h) may occur as a
8 result of this motion or an order based thereon.

9 Respectfully submitted this 4th day of March, 2014.

10 JOHN S. LEONARDO
11 United States Attorney
12 District of Arizona

13 S/ Frederick A. Battista

14 FREDERICK A. BATTISTA
15 PETER S. SEXTON
16 JAMES R. KNAPP
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17 **CERTIFICATE OF SERVICE**

18 I hereby certify that on March 4, 2014, I caused the attached document to be
19 electronically transmitted to the Clerk's Office using the ECF system for filing and
transmittal of a Notice of Electronic Filing to the following ECF registrant:

20 Philip Seplow
21 Shadow Counsel for Defendant Daniel David Rigmaiden

22 A copy of the attached document was also mailed to:

23 Daniel David Rigmaiden
24 Agency No. 10966111
CCA-CADC
25 PO Box 6300
Florence, AZ 85132

26 S/Frederick A. Battista

27 FREDERICK A. BATTISTA
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